

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
JEAN N. RIPLEY
Assistant United States Attorney
United States Attorney's Office
501 South Las Vegas Blvd., Suite 1100
Las Vegas, Nevada 89101
Tel.: 702-388-6336
Jean.Ripley@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARD JAMES SHOVE,

Defendant.

Case No. 2:23-cr-00195-CDS-BNW

**Stipulation to Continue Suppression
Hearing**

(Fifth Stipulation to Continue)

Plaintiff United States of America, by and through its counsel, Jason M. Frierson, United States Attorney, and Jean N. Ripley, Assistant United States Attorney, and defendant Leonard James Shove, by and through his counsel, Rene L. Valladares, Federal Public Defender, and Aden Kahssai, Assistant Federal Public Defender, hereby stipulate and agree to continue the suppression hearing currently scheduled for September 3, 2024, at 9:00 a.m., until September 23, 2024, or September 26, 2024, at a time to be determined by the Court.

The parties enter this stipulation for the following reasons:

1 1. All negotiations have ceased and the parties intend to proceed toward
2 resolution of the pending Motion to Suppress (the “Motion”) (ECF No. 20), including the
3 evidentiary hearing ordered by this Court (ECF No. 21).

4 2. The government anticipates the need to present approximately three to four
5 witnesses at the evidentiary hearing. Two of those witnesses have represented that they were
6 unavailable on September 3, 2024. Both witnesses are necessary to the evidentiary hearing.

7 3. The parties have confirmed with the assigned courtroom administrator that
8 the Court is available on September 23 and September 26, 2024.

9 4. Trial in this matter is currently scheduled on December 16, 2024. The parties
10 do not anticipate that the continuance sought herein will cause a delay in the trial date, and
11 will seek further continuances of the pending trial date if necessary to resolve the issues
12 raised in the Motion or other issues raised in this matter.

13 5. The continuance is not sought for purposes of delay, but only to ensure
14 efficient adjudication of the issues raised in the Motion and use of judicial resources.

15 6. The defendant is in custody and agrees to the continuance.

16 Respectfully submitted this 16th day of August, 2024.

17 RENE VALLADARES

JASON M. FRIERSON

18 Federal Public Defender

United States Attorney

19 /s/ Aden Kahssai

/s/ Jean N. Ripley

20 ADEN KAHSSAI

JEAN N. RIPLEY

21 REBECCA LEVY

Assistant Federal Public Defender

Assistant United States Attorney

22 *Counsel for Defendant Shove*

Counsel for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARD JAMES SHOVE,

Defendant.

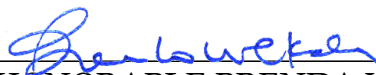
Case No. 2:23-cr-00195-CDS-BNW

Order to Continue Suppression Hearing

Based on the stipulation of counsel, the Court finds that good cause exists to modify the date of the suppression hearing currently scheduled for September 3, 2024.

IT IS FURTHER ORDERED that the suppression hearing currently scheduled for September 3, 2024, at 9:00 a.m., is continued until September 26, 2024 at 9:00 a.m. in Courtroom 3B.

DATED: August 20, 2024


HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE